

<b>USDC SDNY</b> <b>DOCUMENT</b> <b>ELECTRONICALLY FILED</b> <b>DOC #:</b> _____ <b>DATE FILED:</b> 8/21/20 _____
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**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEE**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeferle, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

August 20, 2020

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court at the close of the telephone conference on August 5, 2020, the Plaintiffs' Executive Committees ("PECs"), with the consent of Defendant, the Republic of the Sudan ("Sudan"), write to propose jointly the following schedule for the filing of the pleadings, motion, and briefs authorized by the Court during the August 5, 2020 conference. On August 18, 2020, the PECs and counsel for Sudan met and conferred telephonically and agreed to the following schedule. Sudan's agreement to this schedule is contingent on Plaintiffs promptly proposing and the Court approving a short-form complaint procedure that would allow the Maher, Ryan, and Breitweiser Plaintiffs to be included in the briefing schedule outlined below.

By Tuesday, September 1, 2020, Plaintiffs may file the consolidated and *Ashton* pleadings authorized by the Court at the August 5, 2020 hearing on page 45. *See* Aug. 5, 2020 Tr. at 45:7-18.

By Friday, October 16, 2020, Sudan shall file the motion authorized by the Court. *See id.* at 45:23-46:4.

By Friday, December 4, 2020, all Plaintiffs shall file a single, consolidated opposition brief in response to any motion filed pursuant to the preceding paragraph, as authorized by the Court. *See id.* at 46:4-10.

By Friday, January 22, 2021, Sudan shall file a single, consolidated reply brief in response to Plaintiffs' opposition brief, as authorized by the Court. *See id.* at 46:10-11.

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As stated at the August 5, 2020 telephone conference, Sudan expressly preserves and does not waive any and all objections, privileges, immunities, and defenses that may be available to it, including, without limitation, as to the timeliness of any complaint or claim.

Respectfully submitted,

MOTLEY RICE LLC

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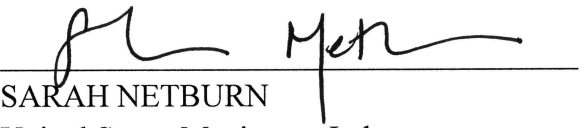
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For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF  
All Counsel of Record via ECF

The Court endorses the parties' proposed briefing schedule. Pursuant to this scheduling order, Plaintiffs' opposition to Sudan's motion to dismiss at ECF No. 5824 is stayed.

**SO ORDERED.**

August 21, 2020  
New York, New York

  
SARAH NETBURN  
United States Magistrate Judge